

Meeting Minutes Transmittal

325/3100 HAZARDOUS WASTE TREATMENT UNIT Unit Managers Meeting 337 Building, Mt. Shuksan Richland, Washington

> October 18, 1994 2:00 p.m. to 4:00 p.m.

The undersigned indicate by their signatures that these meeting minutes reflect the actual occurrences of the above dated Unit Managers Meeting. Date:
Not Present Date: Daniel L. Duncan, RCRA Program Manager, EPA Region 10
Jenne J. Wallace, Unit Manager, Washington State Department of Ecology
325/3100 Hazardous Waste Treatment Unit, PNL Concurrence Kathleen A. Poston, Contractor Representative, PNL
катпівей A. Poston, Contractor Representative, PNL

Purpose: Discuss Permitting Process

Meeting Minutes are attached. The minutes are comprised of the following:

Attachment 1 - Agenda Attachment 2 - Summary of Discussion and Commitments/Agreements

Attachment 3 - Attendance List

Attachment 4 - Action Items

Attachment 5 - RLWS Line Drawings for the 324 and 325 Buildings



325/3100 HAZARDOUS WASTE TREATMENT UNIT Unit Managers Meeting 337 Building, Mt. Shuksan Richland, Washington

> October 18, 1994 2:00 p.m. to 4:00 p.m.

Agenda

- 1. Approval of Past Unit Managers Meeting Minutes (Ecology/RL/PNL)
- 325 HWTU Start-up Schedule (RL/PNL)
- 3. Status of TPA Change Request for TPA Procedural Closure (RL/PNL)
- 4. Status of Combined 325 HWTUs Part A (Form 3) (RL/PNL)
- Status of Combined 325 HWTUs NOI for Tank Storage (RL/PNL)
- Status of Combined 325 HWTUs Part B Permit Application (RL/PNL)
- 7. Status of 300 Area RLWS Compliance Evaluation (RL/PNL)
- Status of Response to 325 SAL Compliance Letter (RL/PNL)
- General Discussion (Ecology/RL/PNL)
- Status Action Items (Ecology/RL/PNL)
 - Past Action Items
 9-20-94:1
 RL/PNL will provide Ecology (Ms. Wallace) drawings of
 the RLWS system for the 324 and 325 buildings.
 - New Action Items
- Next Unit Managers Meeting (Ecology/RL/PNL)
 - Proposed dates during week of November 7
 - Proposed topics

325/3100 HAZARDOUS WASTE TREATMENT UNIT Unit Managers Meeting 337 Building, Mt. Shuksan Richland, Washington

> October 18, 1994 2:00 p.m. to 4:00 p.m.

Summary of Discussion and Commitments/Agreements

1. Approval of Past Unit Managers Meeting Minutes

The July 14, 1994 Unit Manager Meeting minutes were approved and signed. Mr. C. Clark (RL) asked that the words "not present" be typed in his signature spot on the September 20, 1994 Unit Manager Meeting Minutes signature page.

2. 325 HWTU Start-up Schedule

Ms. K. Poston (PNL) reported that the development and approval of the 325 HWTU radiological procedures are being finalized. After that is finished, PNL will be able to complete the ORR. Training on the procedures will also need to be completed before the unit is started up. Ms. J. Wallace (Ecology) inquired as to how long the training will take. Ms. Poston said there were about 13 procedures that staff must be trained to. She also stated that line management will have to become comfortable with the training. To close out the training issues, the actions will be presented to the PNL ORR board then to RL.

3. Status of TPA Change Package Request for TPA Procedural Closure

Mr. B. Day (PNL) stated that one more PNL concurrence signature was needed on the package before it was transmitted to RL for eventual submittal to Ecologoy. Mr. H. Tilden (PNL) stated that because the TPA Change Package affected several centers at PNL, four PNL center manager signatures are needed and obtaining all of the signatures has been a long process. Mr. Tilden expected the package to be transmitted to RL by the end of the week at the latest.

4. Status of Combined 325 HWTUs Part A

Ms. Poston stated that the Part A was certified by PNL director, Bill Madia, on October 7, 1994. She is obtaining the last concurrence signature for transmittal to RL. Mr. Tilden stated that he also expected transmittal of the Part A to RL by the end of the week. Mr. Clark stated that the 325 HWTU Part A will be included with a package for certification by the RL manager. The package contained with mulitiple NOIs, Part As and a closure cost estimate package required by the Hanford Facility Permit. Ms.

Wallace asked why are all Part As being certified. Mr. Clark responded that the Part As are being revised to add the F039 code to them. The F039 has also been include in the 325 HWTU Part A.

5. Status of Combined 325 HWTUs NOI for Tank Storage (RL/PNL)

Ms. Poston stated that the development of the NOI is on hold pending the outcome of regulatory issues with the slab tanks in the 325 High Level Radiochemistry Facility (HLRF). There was a chance that the Slab tanks might have to be permitted.

Status of Combined 325 HWTUs Part B Permit Application (RL/PNL)

Ms. Poston indicated that a stop work order had been issued to the contractor, AT Kearney, who was developing the Part B Permit Application because of very poor product quality. She also stated that services Battelle-Oak Ridge have been acquired to pickup where AT Kearney had left off. Mr. Orlando Olivares of Battelle's Technology Policy and Analysis Center in Richland will be coordinating the Part B development with Battelle-Oak Ridge staff. Mr. Clark asked that the development of the Part B also be coordinated with WHC. Ms. Wallace asked if the development of the Part B will meet the current schedule. Ms. Poston stated that PNL was planning on meeting the June 1995 date that had been proposed in earlier 325/3100 HWTU Unit Manager Meetings.

7. Status of 300 Area RLWS Compliance Evaluation (RL/PNL)

Mr. Clark stated that an evaluation of 340 compliance issues and RLWS boudaries for RCRA permitting purposes had been prepared and in fact he had it in his possession. At the present time he can not give to Ms. Wallace because he has not had time to review the evaluation. Ms. Wallace asked if WHC and PNL had prepared separate evaluations. Mr. Clark responded that one evaluation was being prepared with WHC and PNL input. Also, that part of the problem in preparing the evaluation was that PNL and WHC did not entirely agree on all issues. Mr. Clark then shared several of the compliance items that been identified in the evaluation, including the possible location of RLWS boudaries for RCRA permitting PNL and WHC portions. Mr. Clark stated that the evaluation shall be submitted to her and Ecology in the near future.

At this time, line drawings of the RLWS system were provided to Ms. Wallace. Mr. Clark stated that the valve nearest PNL building walls would probably be used as the system boundaries but in discussions with S. Moore of Kennewick Ecology other options, such as permitting the 324 and 325 building as their own units, had not been rule out. Ms. Wallace inquired whether there were valves in the RLWS lines at the walls of all affected PNL buildings. Mr. Tilden stated in allot of cases there were but not in all. The RLWS line drawings were then reviewed to determine valve locations in the RLWS system. As the line drawings were reviewed, Mr. Tilden stated that the drawings were summaries of H-3 line

drawings. Mr. Tilden also state that all PNL RLWS lines will not be included in the permitting. A line between 325 and 325 had never carried dangerous waste and never will.

Ms. Wallace then inquired if there had been any action on the 340 compliance issues. Mr. Clark said it is on hold while all the information is gathered. Once it has been accomplished, RL and its contractors will again meet with Ecology.

8. Status of Response to 325 SAL Compliance Letter (RL/PNL)

Mr. Tilden stated that a response letter had been transmitted to RL on September 30. It stated that three out of the four compliance item actions had been completed. The one outstanding compliance item that had not been complete was the installation of a flow meter on tank TK-1 in the basement of the 325 SAL. Ms. Poston stated that the installation of the flow meter was being held up by the 325 building shutdown. Mr. Clark stated that he thought that the letter had been submitted to Ecology. Ms. Wallace asked how the Hanford Annual Dangerous Waste report was put together and how the data was correlated. Mr. Day stated that his understanding that the data was gathered and put together on a TSD unit by unit basis.

9. General Discussion

Ms. Wallace state that she was still waiting for a variance request from the Treatment by Generator (TBG) notification requirements for a revised Form 2. Mr. Tilden stated that the letter went to RL on October 7. Ms. Poston discussed the 325 HLRF slab tanks that were upstream of where the TBG activities were to take place. Ms. Wallace inquired if there had been any physical inspection of the tanks. Ms. Poston stated there had not been any visual inspection yet because access was problem because of high radiation in the slab tank vault. A visual inspection has been scheduled later in the year and it also has been held up by the 325 building shutdown. The only current alternative was a sump alarm for the sump in the vault. Ms. Poston did state that the sump had a stainless steel liner and Mr. Tilden stated that the sump could be immediately pumped to another holding area. Ms. Poston went on to state that the sump could also hold the entire contents of all slab tanks in the vault.

Jeanne stated that she was planning on discussing the TBG and slab tank issues with Kennewick Ecology managers, Lundstrom and S. Alexander.

10. Status Action Items (Ecology/RL/PNL)

Mr. Day provided Ms. Wallace with a line drawings of the RLWS system for the 324 and 325 buildings during the discussion of the 300 Area RLWS Compliance Evaluation discussion. This action closed out action item 9-20-94:1.

There were no new action items from this meeting.

11. Next Unit Managers Meeting

Proposed dates during week of October 17

The next Unit Managers Meeting was scheduled for November 30.

Proposed Topics

Proposed topics for the next Unit Managers Meeting include: discussion regarding the TPA change package; the procedural closure request for the Thermal, Physical/Chemical and Biological Treatment Test Facilities; the 325 HWTU start-up schedule; and a status on the consolidated Form 3, NOI and Part B permit application.

325/3100 HAZARDOUS WASTE TREATMENT UNIT

Unit Managers Meeting 337 Building, Mt. Shuksan Richland, Washington

October 18, 1994 2:00 p.m. to 4:00 p.m.

Attendance List

Name	Organization	Phone #
Clifford E. Clark	RL	(509) 376-9333
Brian J. Day	PNL	(509) 376-3835
Kathy A. Poston	PNL	(509) 376-4287
Usha Subrahmanyam	GSSC	(509) 946-3686
Harold T. Tilden	PNL	(509) 376-0499
Jeanne J. Wallace	Ecology	(509) 376-3019
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October 18, 1994 2:00 p.m. to 4:00 p.m.

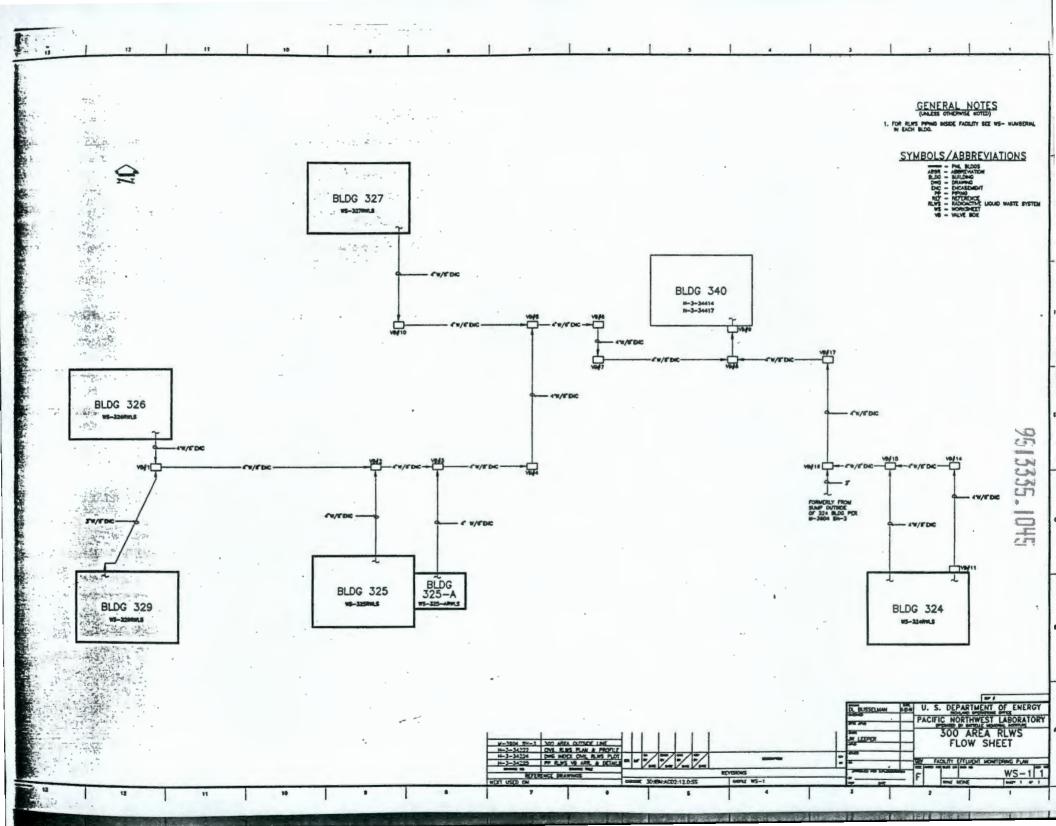
Action Items

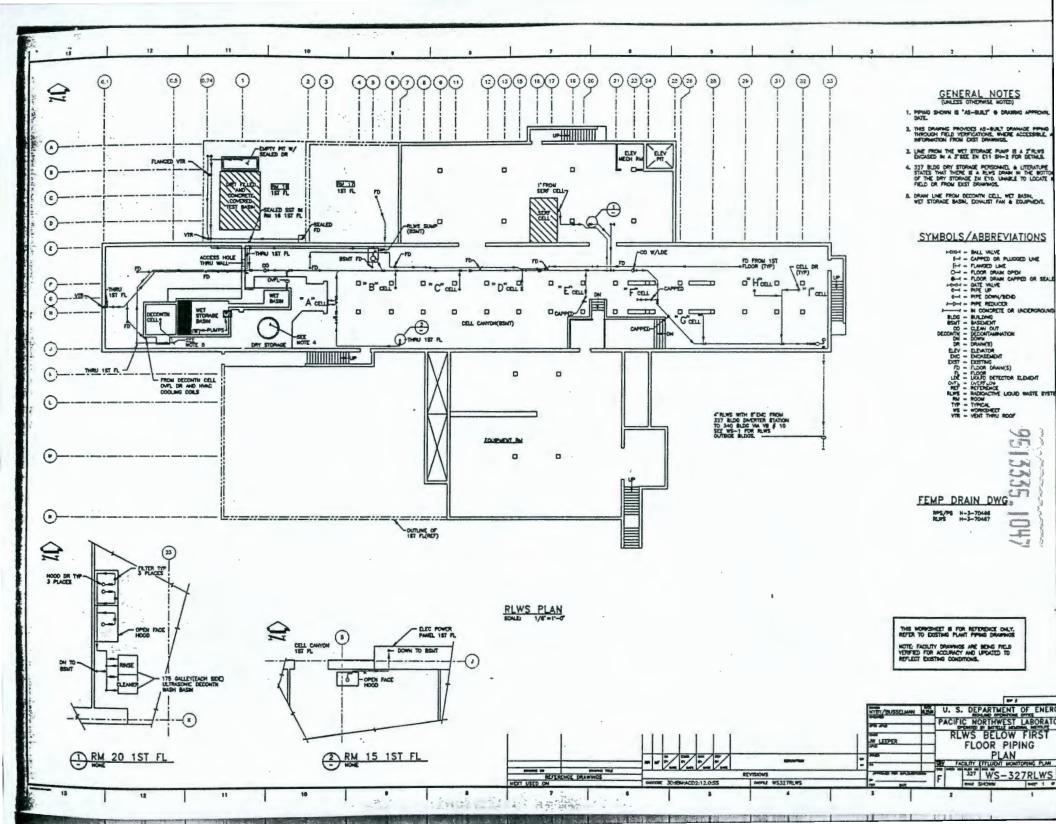
Action Item #	<u>Description</u>		
6-7-94:1	PNL will provide Ecology (Ms. Wallace) a full justification regarding the TPA change request package by August 15, 1994.		
	Closed		
9-20-94:1	PNL will provide Ecology (Ms Wallace) with RLWS drawings for the 324 and 325 buildings.		
	Closed		

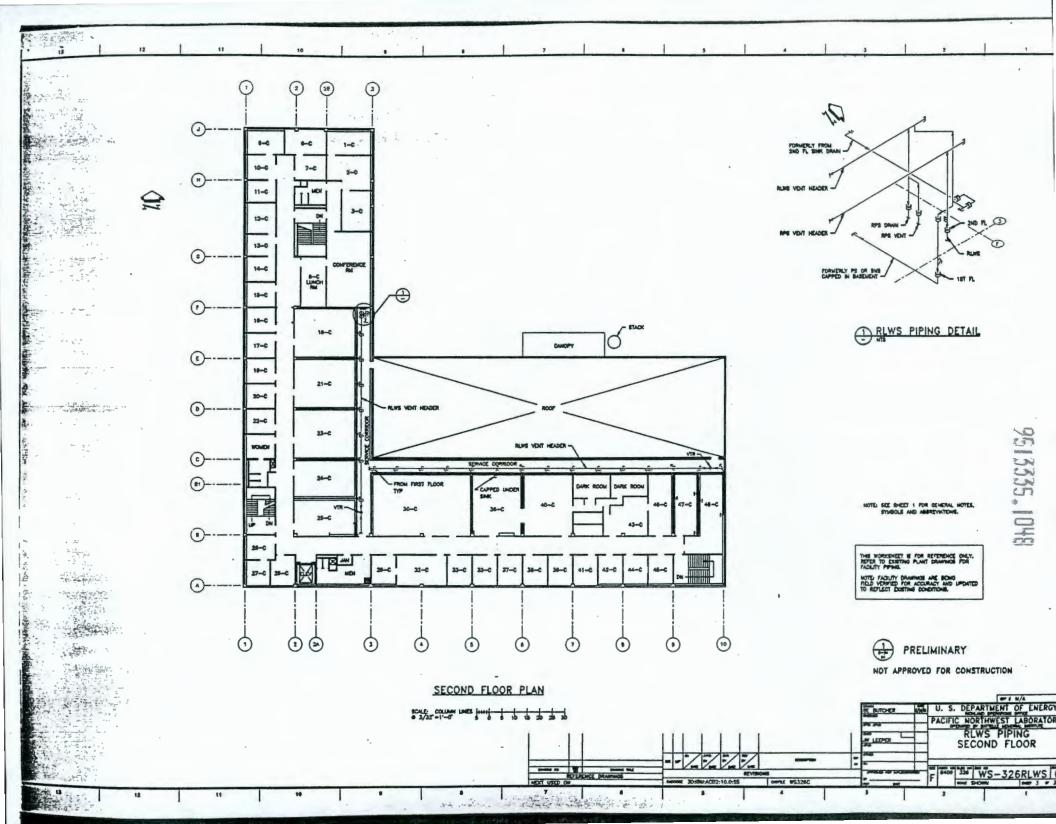
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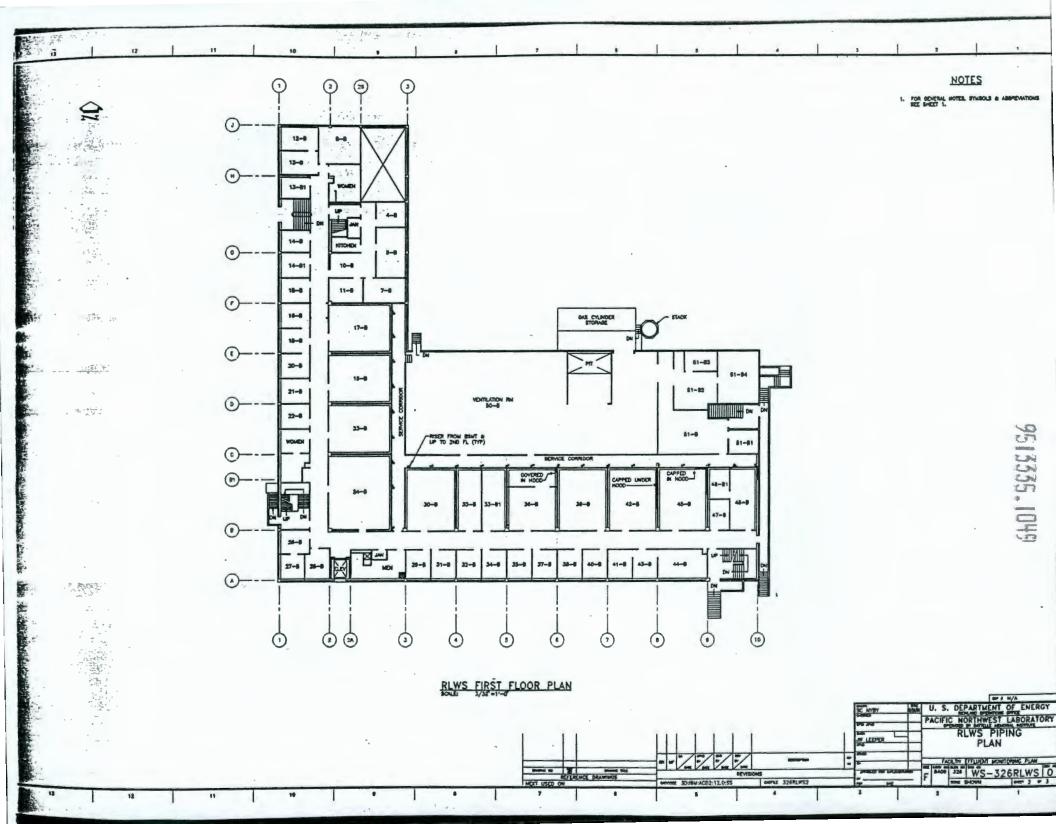
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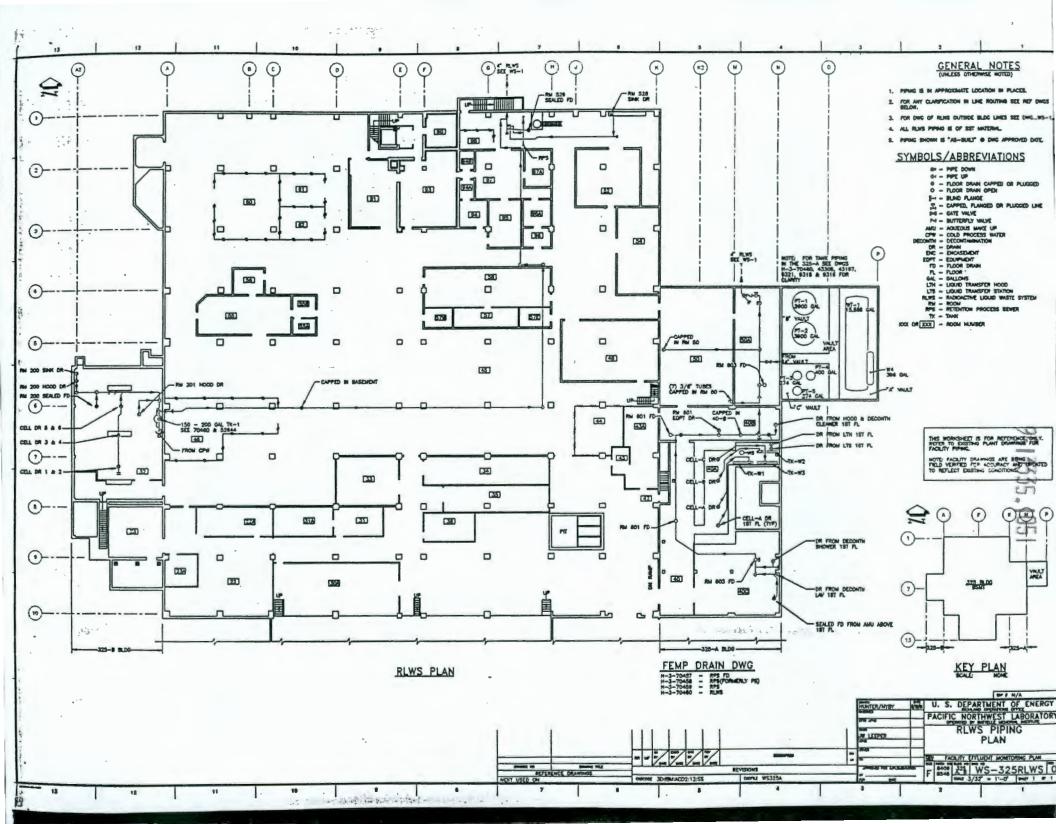
RLWS Line Drawings for the 324 and 325 Buildings

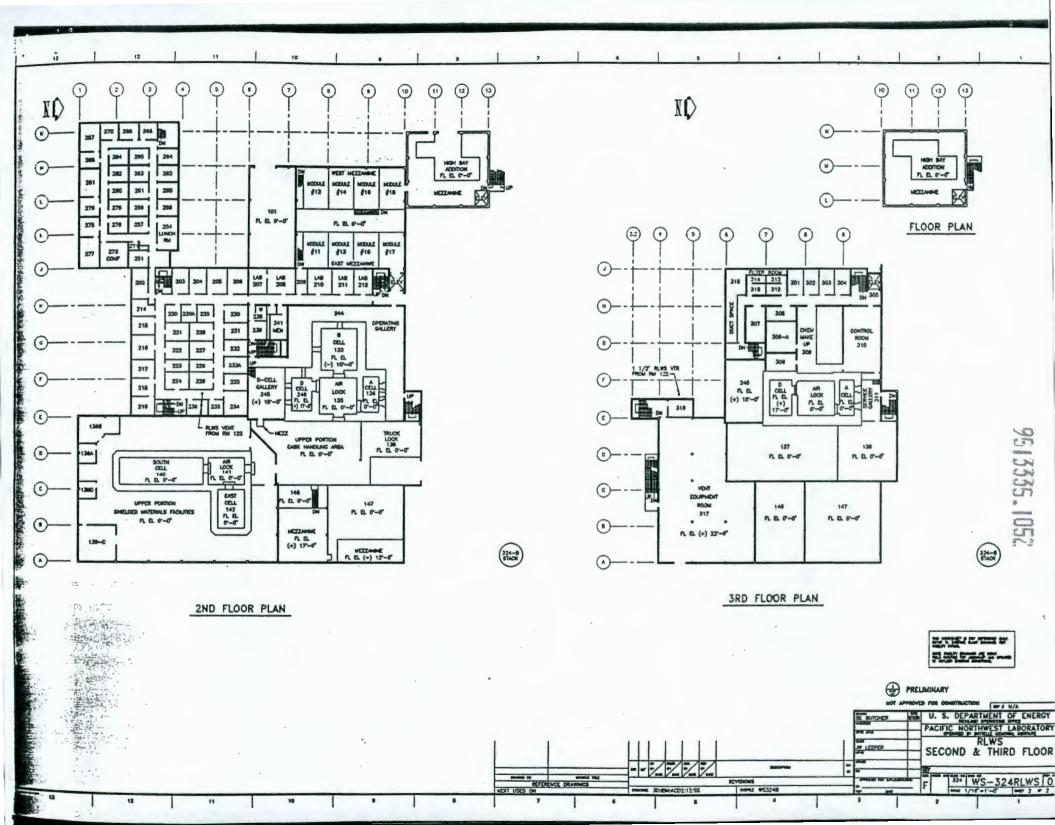


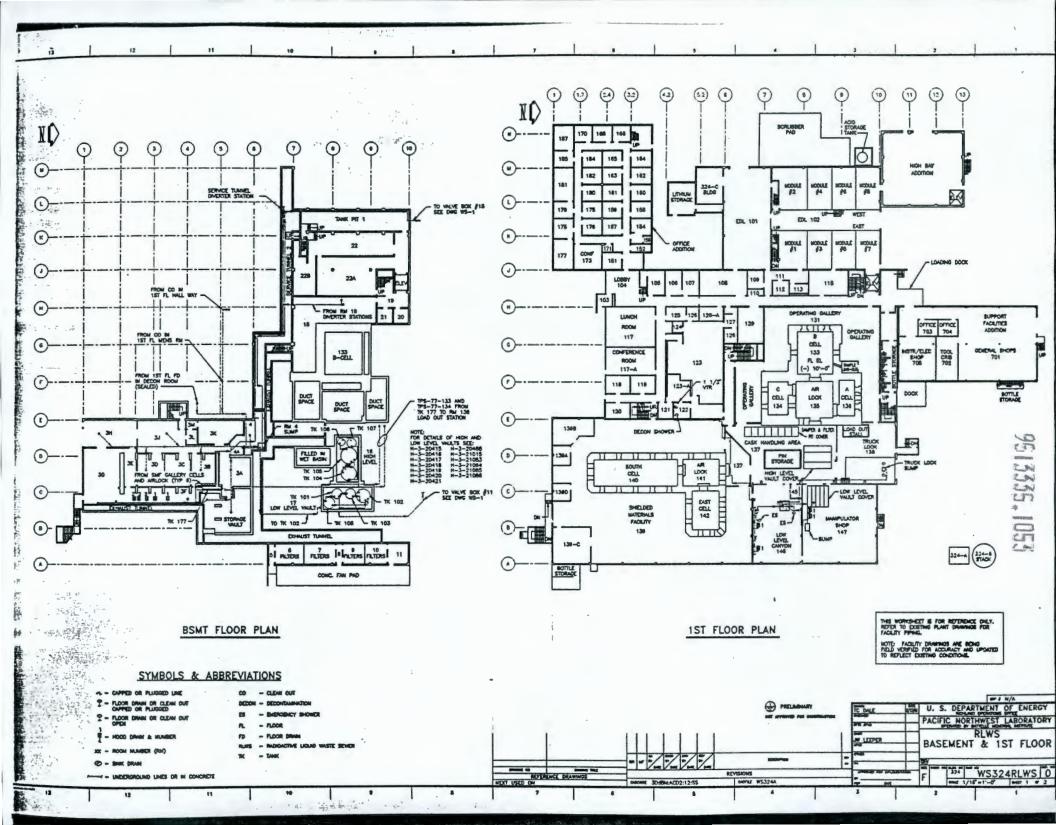


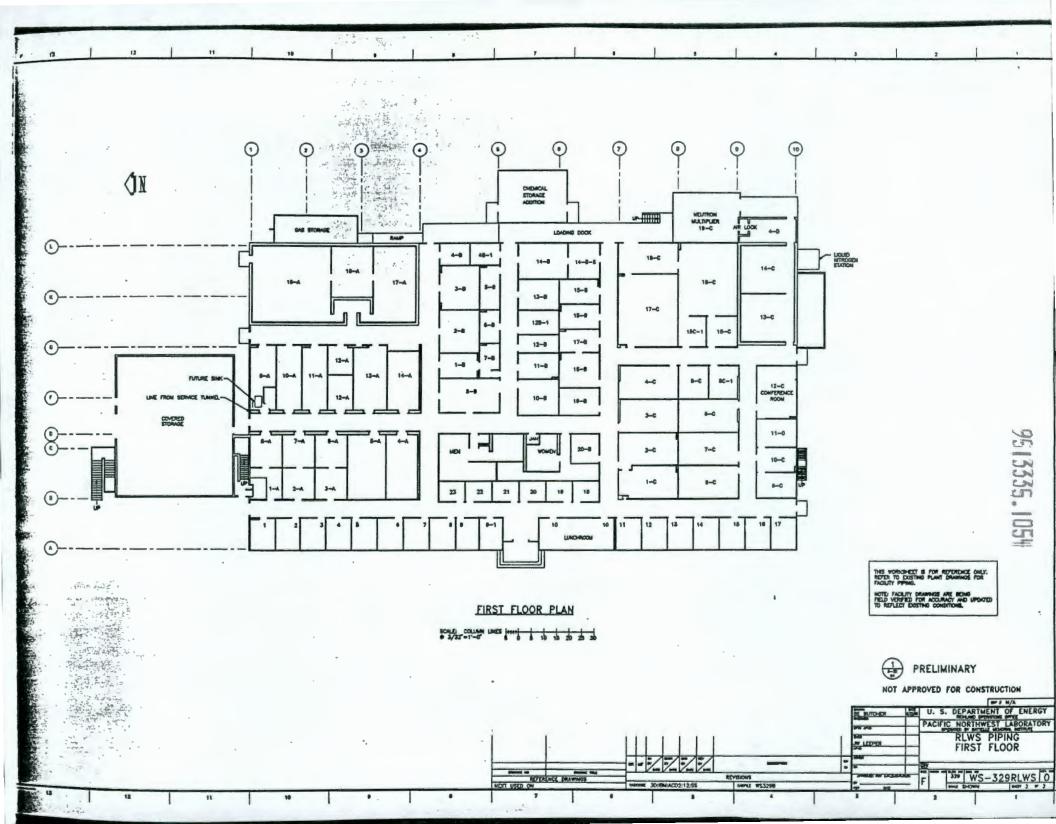












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B. J.	Day	PNL		P7-79
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H. T.	Tilden II	PNL		P7-79
P. J.	Turner	PNL		P7-34
J. J.	Wallace	Ecology		B5-18
RCRA F	iles/GHL	WHC		H6-23

ADMINISTRATIVE RECORD: 325/3100 Hazardous Waste Treatment Unit, T-3-4 [Care of EPIC, WHC (H6-08)]

Washington State Department of Ecology Nuclear and Mixed Waste Hanford Files, P.O. Box 47600, Olympia, Washington 98504-7600

Environmental Protection Agency Region 10, Seattle, Washington 98101, Mail Stop HW-106 (Records Center)

Please send comments on distribution list to K. E. Knox (H6-24), (509) 372-3596.